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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

RICHARD WITTREN,

Plaintiff,

v.

PETE GEREN, SECRETARY,
DEPARTMENT OF THE ARMY,

Defendant.

Case No. C 08 - 2220 MEJ

STIPULATION AND ~~PROPOSED~~
ORDER TO MODIFY DISCOVERY AND
SUMMARY JUDGMENT DATES

1 Plaintiff and Defendant, by and through their undersigned attorneys, hereby enter into the
2 following stipulation and request its approval by the Court.

3 WHEREAS the parties have consulted with the ADR office as required by the Court;

4 WHEREAS, due to significant scheduling conflicts of the parties and the mediator, the
5 parties have not been able to schedule a mediation date until July 15, 2009;

6 WHEREAS, the parties would like to save time and effort prior to the mediation and thus,
7 slightly alter the current scheduling order to defer discovery and summary judgment dates until
8 after the mediation is completed;

9 ACCORDINGLY, the parties agree to continue the following dates:

10 Summary judgment filing date continued from July 2, 2009 to August 20, 2009;

11 Summary judgment hearing date continued from August 6, 2009 to September 24, 2009;

12 Fact discovery cut-off date continued from June 5, 2009 to August 10, 2009;

13 Expert disclosure date continued from May 11, 2009 to September 1, 2009;

14 Rebuttal expert disclosure date continued from May 21, 2009 to September 22, 2009;

15 Expert discovery cut-off date continued from June 5, 2009 to October 6, 2009.

16
17 **IT IS HEREBY STIPULATED:**

18 Dated: April 28, 2009

THE SAXON LEONARD LAW FIRM

19
20 _____
21 /s/
22 By: Beverly Saxon Leonard
23 Attorneys for Plaintiff

24 Dated: April 28, 2009

JOSEPH P. RUSSONIELO

25 _____
26 /s/
27 By: Victoria R. Carradero
28 Assistant United States Attorney
Attorneys for Defendant

Pursuant to Stipulation, **IT IS HEREBY ORDERED** that the deadlines referenced above

are continued as follows:

Summary judgment filing date continued from July 2, 2009 to August 20, 2009;

Summary judgment hearing date continued from August 6, 2009 to September 24, 2009;

Fact discovery cut-off date continued from June 5, 2009 to August 10, 2009;

Expert disclosure date continued from May 11, 2009 to September 1, 2009;

Rebuttal expert disclosure date continued from May 21, 2009 to September 22, 2009;

Expert discovery cut-off date continued from June 5, 2009 to October 6, 2009.

DATED: April 30, 2009

Magistrate Judge Maria-Elena James